

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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	)	
IN RE: PHARMACEUTICAL INDUSTRY	)	
AVERAGE WHOLESALE PRICE	)	
LITIGATION	)	MDL No. 1456
	)	Civil Action No. 01-CV-12257-PBS
	)	
-----	x	
	)	Hon. Patti B. Saris
THIS DOCUMENT RELATES TO:	)	
International Union of Operating Engineers,	)	
Local No. 68 Welfare Fund v. AstraZeneca PLC	)	
et al. Civil Action No. 04-11503-PBS	)	
	)	
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**ASTRAZENECA’S MOTION TO COMPEL THE PRODUCTION OF  
DOCUMENTS BY PLAINTIFF INTERNATIONAL UNION OF OPERATING  
ENGINEERS, LOCAL NO. 68 WELFARE FUND**

Pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure, Defendant AstraZeneca Pharmaceuticals LP (“AstraZeneca”), through its undersigned counsel, respectfully moves this Court to compel the production of documents by Plaintiff International Union of Operating Engineers, Local No. 68 Welfare Fund. The grounds for this motion are stated in AstraZeneca’s accompanying Memorandum of Law in Support of AstraZeneca’s Motion to Compel the Production of Documents by Plaintiff International Union of Operating Engineers, Local No. 68 Welfare Fund.

WHEREFORE, for the reasons set forth in the memorandum described above, Defendant AstraZeneca respectfully requests this Court to compel the production of

documents by Plaintiff International Union of Operating Engineers, Local No. 68  
Welfare Fund.

Respectfully Submitted,

By: /s/ Lucy Fowler

DATED: November 17, 2005

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on November 17, 2005, a copy to Verilaw Technologies for posting and notification to all parties.

/s/ Lucy Fowler

Lucy Fowler

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for Defendant conferred with counsel for Plaintiffs on this motion, and attempted in good faith to resolve or narrow the issue.

/s/ James J. Duffy

James J. Duffy